

## LAW OFFICE OF GARY GREENBERG, ESQ.

*666 Third Avenue, 10<sup>th</sup> Floor  
New York, New York 10017*

*Phone: 212-765-5770  
E-mail: gg@ggreenberglaw.com*

May 16, 2022

**By ECF**

The Honorable Stewart D. Aaron  
United States District Court  
for the Southern District of New York  
500 Pearl Street, Room 1970  
New York, New York 10007

Re: Rohan Ramchandani v. Citigroup Inc., et al.,  
Civil Action No. 1:19-cv-9124 (VM) (SDA)

Dear Judge Aaron:

The Parties submit this joint letter pursuant to the Court's Order dated April 26, 2022 to propose a revised discovery schedule. The attorneys for the respective parties met and conferred and propose that the discovery schedule be revised as follows:

1. **Fact Discovery:** All fact discovery to conclude by July 15, 2022.
2. **Expert Discovery:**
  - a. Plaintiff's Expert Report to be served on or before June 30, 2022.
  - b. Defendants' Rebuttal Expert Report to be served on or before July 30, 2022.
  - c. Expert depositions to commence by August 1, 2022 and to conclude by August 15, 2022.

The parties reserve the right to seek an adjustment in the schedule in the event that future discovery disputes cause a delay in the completion of deposition testimony.

Law Office of Gary Greenberg, Esq.


The Honorable Stewart D. Aaron

May 16, 2022

Page 2

Respectfully submitted,

LAW OFFICE OF GARY GREENBERG, ESQ.

By:   
Gary Greenberg  
666 Third Avenue, 10th Floor  
New York, New York 10017  
Telephone: (212) 765-5770  
[gg@ggreenberglaw.com](mailto:gg@ggreenberglaw.com)

LAW OFFICE OF DAVID R. LURIE, PLLC  
194 President Street  
Brooklyn, New York 11231  
Telephone: (347) 651-0194  
[david@davidlurielaw.com](mailto:david@davidlurielaw.com)

*Counsel for Plaintiff*

GOODWIN PROCTER LLP

By: s/  
Marshall H. Fishman  
Samuel J. Rubin  
William J. Harrington  
Lindsay Hoyle  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
Telephone: (212) 813-8800  
Facsimile: (212) 355-3333  
[mfishman@goodwinlaw.com](mailto:mfishman@goodwinlaw.com)  
[srubin@goodwinlaw.com](mailto:srubin@goodwinlaw.com)  
[wharrington@goodwinlaw.com](mailto:wharrington@goodwinlaw.com)  
[lhoyle@goodwinlaw.com](mailto:lhoyle@goodwinlaw.com)

*Counsel for Defendants*